

STATE BUILDING CODE INTERPRETATION NO. I-31-00

May 3, 2000

The following is offered in response to your request for interpretation of sections 302.1.2 and 1110.3 of the BOCA National Building Code/1996 portion of the 1999 State Building Code as they apply to the requirement for providing accessibility in an accessory area.

Question: Is it the intention of State Building Code section 302.1.2 to exempt portions of buildings, which qualify as accessory areas in accordance with section 302.1.2, from the requirements of section 1110.3 to comply with accessibility provisions for new construction if they undergo what would otherwise be called a change of occupancy?

Answer: No. The principal focus of section 302.1.2 is fire separation, construction classification and suppression requirements. Certain spaces that qualify as accessory areas do not require separation from the main use group, and the suppression requirements and construction classification are based on the main use group. Accessibility for the disabled is, however, required in the accessory area as well as the main use group area. The intent of section 1110.3 is to require that accessibility be provided in any building undergoing a change of occupancy. This intent also applies to portions of buildings. Any change of occupancy to an accessory area, as well as the main use group area, would therefore require that such area be made accessible, unless determined technically infeasible in accordance with section 106.2.2.